

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
DELAWARE

Daniel M. Woods,

Plaintiff.

VS.

Board of parole, Stanley Taylor,

Patricia Carr, Repheal Williams,

Thomas Carroll , Cindy Wright

Brenda Calloway, L. Sullivan, P. Riter,

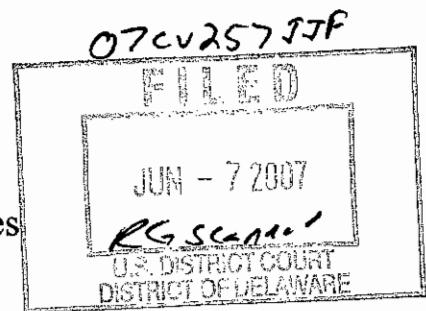
E. Escherich and Jane Doe (elw).

Defendants.

The suit is against, individually and in their official capacities

C.A.N.# 07-275 (JJF)

Civil Action Complaint



MOTION FOR REQUEST OF APPOINTMENT OF COUNSELOR

DATED: 6-8-07

Daniel M. Woods # 164728

D.C.C.

1181 Paddock Rd.

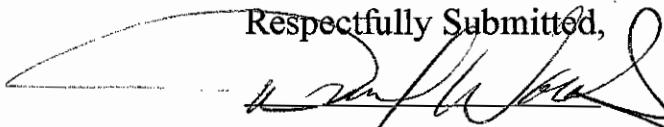
Smyrna, De. 19977

Pursuant to 28 U.S.C. 1915(e)(1) plaintiff moves for an order appointing counsel to represent him in this case. In support of this motion, plaintiff states:

11. Plaintiff is unable to afford counsel. He has requested leave to proceed in *Forma pauperis*.
12. Plaintiff's imprisonment will greatly limit his ability to litigate. The issues involved in this case are complex, and will require significant research and investigation. Plaintiff has limited access to the law library and limited knowledge of the law.
13. A trial in this case will likely involve conflicting testimony, and counsel would better enable plaintiff to present evidence and cross examine witnesses.
14. Plaintiff will need counsel to protect the rights of the plaintiff during any proceedings with depositions that take place through this case.
15. In the interest of justice counsel would be able to present the crux of the issues for the court and a jury and gather all evidence that plaintiff would and will be denied due to his incarceration.

Plaintiff requests this Honorable Court to grant this motion for appointment of counsel because the plaintiff has shown that there is merit to this case.

Respectfully Submitted,


Daniel M. Woods # 164728

IM Thomas E. White
SB# 36969 D UNIT 5E
DELAWARE CORRECTIONAL CENTER
1181 PADDOCK ROAD
SMYRNA, DELAWARE 19977

Lega



Clerk of the Court
District Court
844 N. King St. Boxbox 18
Wilmington, De.

19801-3570

Legal Mail